

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBYN ABRAHAM,

Plaintiff,

-against-

ABBY LEIGH in her individual capacity and as
Executrix of the ESTATE OF MITCH LEIGH, THE
VIOLA FUND, ABBY LEIGH LTD, MARTHA
WASSERMAN in her individual capacity and as
Executrix of the ESTATE OF DALE
WASSERMAN, HELLEN DARION, in her
individual capacity as Executrix of the ESTATE OF
JOSEPH DARION, and ALAN HONIG,

Defendants.

Case No. 17-cv-5429 (KPF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Ira S. Sacks, dated June 12, 2019 and the exhibits annexed thereto, the accompanying Declaration of Duc Nguyen, dated May 23, 2019 and the exhibits annexed thereto, and the accompanying Memorandum of Law, dated June 12, 2019, and all prior pleadings and proceedings in this case, Defendants Martha Wasserman, in her individual capacity as Executrix of the Estate of Dale Wasserman, and Alan Honig, by and through their undersigned counsel, hereby move this Court before the Honorable Katherine Polk Failla, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York, 10007, for an order: (i) granting the motion and issuing sanctions against Plaintiff Robyn Abraham, pursuant to the Court's inherent power to impose sanctions on a party for perpetrating a fraud on the Court or, alternatively, pursuant to the Federal Rules of Civil Procedure, Rule 37; and (ii) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to this Court's Memo Endorsed Order, dated June 10, 2019 (Document No. 230), oppositions, if any, are due on or before July 10, 2019 and replies, if any, are due on or before July 24, 2019.

Dated: New York, New York
June 12, 2019

AKERMAN LLP

/s/ Ira S. Sacks
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*Attorneys for Defendants Alan Honig and
Martha Wasserman, as Executrix of the
Estate of Dale Wasserman*